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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JORGE ROSALES,

Plaintiff,

vs.

BELLAGIO, LLC, a Nevada corporation;
ROE Business Organizations I-X; and DOE
INDIVIDUALS I-X, inclusive,

Defendants.

Case No. 2:17-cv-03117-JCM-GWF

**STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR
DEFENDANT TO FILE ITS REPLY IN
SUPPORT OF ITS RENEWED MOTION
FOR SUMMARY JUDGEMENT
[FIRST REQUEST]**

Pursuant to Local Rules IA 6-1, IA 6-2, and 7-1, all parties hereby stipulate to extend the time for Defendant to file its Reply in Support of its Renewed Motion for Summary Judgment (ECF No. 45). This is the first request to extend this deadline. This request is sought in good faith and not for purposes of undue delay.

The extension is necessary because of Defense counsels' extremely heavy workload across multiple courts during the months of September and October. This includes, but it not limited to, dispositive motion briefing in another pending case, multiple mediations, and extensive electronic discovery. This does not include Defense counsel conducting their normal course of business including witness interviews, written discovery, and depositions in litigation pending in various state and federal courts, including travel.

1 Therefore, the parties agree that an extension of time is appropriate and stipulate that
2 Defendant shall have up to and including October 19, 2020, to file its reply in support of its renewed
3 motion for summary judgment.

4 Dated this 6th day of October, 2020.

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6 KEMP & KEMP

JACKSON LEWIS P.C.

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8 /s/ Victoria L. Neal
James P. Kemp Bar, No. 6375
9 Victoria L. Neal, Bar No. 13382
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11 *Attorneys for Plaintiff*
12 *Jorge Rosales*

Attorneys for Defendant
Bellagio, LLC

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14 **ORDER**

15 **IT IS SO ORDERED:**

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17 Dated: October 7, 2020


18 UNITED STATES DISTRICT JUDGE

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21 4839-2398-9966, v. 1
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